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DEPT. OF TRANSPORTATION  
DOCKET SECTION

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Scherling Plough

U. S Department of Transportation Dockets  
Docket No. FAA-98-4390-T  
400 Seventh St., SW  
Rm. Plaza 401  
Washington, DC 20590

September 18, 1998

Gentlemen:

The Notice of Proposed Rulemaking (NPRM) titled "Flight Plan Requirements for Helicopter Operations Under Instrument Flight Rules." (63 Fed. Reg. 46834 [September 2, 1998]) has been a long time coming. It is only fair that this unique machine be recognized for its very special operating capabilities. This rule, if passed, will have an extremely positive impact on future helicopter operations and aviation in general.

This rule would:

- Provide an increased level of safety in helicopter operations.
- Reduce helicopter accidents.
- Greatly increase the productivity of the helicopter.
- Encourage helicopters to utilize the IFR system and promote development of additional unique IFR helicopter procedures.
- Implement the suggestions of the NTSB and the FAA to improve helicopter safety and provide access to the IFR system.
- Provide an additional margin of safety over flight in marginal VFR conditions by encouraging helicopter flight in the IFR system.
- Result in an enhanced level of helicopter flight planning that allows an equivalent level of safety to be maintained.

This rule recognizes the unique characteristics of helicopter operations and should just be the beginning of changes in the way helicopters are allowed to operate within the air traffic system.

Sincerely,

Rusling Wood, IV  
Chief Helicopter Pilot